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June 22, 2007

Via Electronic Filing

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street SW
Washington, DC 20554

Re: *Ex Parte* Notice: CG Docket No. 03-123

Dear Ms. Dortch:

On June 21, 2007, Rebecca Ladew, East Coast Liaison for Speech Communication Assistance by Telephone, Inc. (SCT) and the undersigned met with Scott Bergmann, Bill Freedman, Ian Dillner, Cathy Seidel, Tom Chandler Nicole McGinnis, and Scott Deutchman. Bob Segalman of SCT also participated in all the meetings via telephone. During the meetings, we explained how the Speech-to-Speech (STS) relay service works and its growing importance to thousands of speech-impaired individuals who are otherwise unable to utilize the telephone. We also discussed the need to ensure adequate funding for this new but important service – including funding for outreach and marketing – and concerns over the adverse effect that reductions in the STS rate may have on incentives for providers to expand the service. Finally, we asked the FCC to consider including an STS representative on the FCC's Consumer Advisory Committee. The attached presentation summarizes many of the key points discussed during the meetings.

Sincerely,



Aileen A. Pisciotto, Esq.
Licensed in the District of Columbia (Bar
#3754345)

Attachment

Cc:	Scott Bergmann	Bill Freedman
	Aaron Goldberger	Tom Chandler
	Ian Dillner	Nicole McGinnis
	Cathy Seidel	Scott Deutchman

Speech-to-Speech (STS)

Presentation by Speech Communications Assistance by Telephone, Inc.

Re: **CC Docket No. 03-123**

June 21, 2007

STS User Community:

- STS serves individuals who are speech impaired due to such causes as accidental brain injury, larynx removal due to cancer, Cerebral Palsy, Multiple Sclerosis, Muscular Dystrophy, Stuttering, Spasmodic Dysphonia, ALS, or Parkinson's Disease.
- Without special assistance, this community cannot utilize the telephone.
- STS is new and utilization is still low
 - **About 25% of the 2.5 million speech disabled Americans¹ can use STS successfully (total of 250,000-500,000 Americans).**
 - Only a few thousand people appear to be aware of and to use STS now.

STS Service:

- No specialized equipment required.
- User dials an access number (e.g., 711) to reach a specially trained communications assistant (CA) and provides the CA with the number being called.
- CA then dials the number and (if necessary) explains STS to the called party.
- Caller talks into the telephone and CA re-voices the words *verbatim* so that the called party can hear.
- When the called party talks, the caller simply listens, with no help from CA.

Position on CC Docket No. 03-123: Proposed Rate Cuts Would be Disastrous

- STS is a nascent service reaching only a fraction of the potential user community.
- Marketing and outreach are crucial to increasing awareness and use of STS by both speech disabled and general public.
- Cuts in the rate for STS as proposed by NECA and the Hamilton MARS plan would stunt the development of the service and harm the speech-disabled community.
- Small volume relay service such as STS should not be the focus for rate cutting.

Request to the FCC:

- Set the rate for STS based on providers' projected costs.
- Ensure the STS rate is high enough to encourage providers to offer the service and educate the public about its availability.
- Consider expanding FCC Consumer Advisory Committee to include an STS representative.

Speech Communication Assistance By Telephone, Inc. (SCT) is a non-profit (501(c)(3)) organization dedicated to helping the speech-disabled gain access to the social and economic benefits of telephonic communications using Speech-to-Speech. SCT has filed ex parte comments by letter in CC Docket No. 03-123.

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¹ From "Americans with Disabilities 1991-92," Bureau of the Census Report, U.S. Department of Commerce Economics and Statistics Administration, 1993.